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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

KIRSTIN BLAISE LOBATO,)	
)	Case No. 2:19-cv-01273-RFB-EJY
Plaintiff,)	
v.)	
)	
LAS VEGAS METROPOLITAN)	
POLICE DEPARTMENT, NEVADA,)	STIPULATION TO EXTEND
THOMAS THOWSEN, and JAMES)	BRIEFING SCHEDULE OF
LAROCHELLE,)	DEFENDANTS' POST-TRIAL
)	MOTIONS
Defendants.)	

Plaintiff Kirstin Blaise Lobato, by and through counsel of record, and
 Defendants Las Vegas Metropolitan Police Department, Thomas Thowsen, and
 James LaRoche, through their counsel of record, hereby stipulate and agree to
 the following:

- 1) Judgment was entered against Defendants in this matter on January 6, 2025. Dkt. 207.
- 2) Pursuant to this Court's scheduling order, post-trial motions were due within 28 days of judgment being entered. Dkt. 211.
- 3) Defendants filed a motion for a new trial and a motion for judgment as a matter of law on February 3, 2025. Dkts. 214, 216.
- 4) Defendants also filed motions to exceed the page limits with these motions. Dkts. 213, 215.
- 5) Plaintiff opposes the motions to exceed the page limits, Dkt. 217. Plaintiff has also asked the Court to require Defendants to file shorter briefs. *See* Dkt. 218.
- 6) At current, this Court has not ruled on the motions for extra pages or Plaintiff's motion to strike.
- 7) While the parties understand the Court's subsequent rulings may impact the briefing schedule depending on how the court rules, Plaintiff's responses to these motions are currently due on February 18, 2025.
- 8) If that deadline remains, Plaintiff cannot meet this timeframe due to other case obligations. These include: for Mr. Owens, a summary judgment response due on February 18th in *McGuffin v. Dannels*, Case No. 2:20-cv-01163-MTK (Dis. Or.), an oral argument before the Missouri Court of Appeals on February 19th in *Holmes v. Zellers*, Case No. ED112676, and motion to dismiss responses in *Moses v. City of New Orleans*, Case No. 2:24-cv-01768-BWA-KWR (E.D. La.) on February 26, 2025; for Ms. Wang, a Tenth Circuit brief due on February 21, 2025, in *Packard, et al. v. City and County of Denver*, No. 24-1367 (10th Cir.); and, for Ms. Pierce, summary judgment responses due February 28, 2025 in

Ezell v. Dunn, et al., 4:20-cv-02058-ACA (N.D. Ala.) and *Guy v. Dunn*, et al., 4:21-cv-00264-ACA(N.D Ala.).

9) Absent this Court’s intervention or ruling on the other motions (which may or may not alter the schedule), Plaintiff therefore seeks until at least March 7, 2025, to file her response to Defendants’ motions for new trial or judgment as a matter of law.

10)Plaintiff additionally seeks to file a single omnibus brief in response to both motions.

11)Plaintiff’s counsel has conferred with counsel for Defendants and the parties have agreed to this extension and to Plaintiff filing a single omnibus brief. The parties also agree that Defendants will have two weeks, until March 21, 2025, to reply to Plaintiff’s response.

RESPECTFULLY SUBMITTED,

/s/David B. Owens
One of Plaintiff’s Attorneys

/s/Craig Anderson
One of Defendants’ Attorneys

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ORDER

IT IS SO ORDERED that the above Stipulation is hereby GRANTED. Plaintiff shall have until March 7, 2025 to file an omnibus response to Defendants' post-trial motions. Defendants shall have until March 21, 2025 to file their reply.

DATED this 17 day of February, 2025.



UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I, David B. Owens, an attorney, hereby certify that on February 12, 2025, I filed the foregoing Stipulation and Proposed Order via CM/ECF, which was electronically delivered to all counsel of record.

/s/ David B. Owens
One of Plaintiff's Attorneys